

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. \_\_

**ORDER SUSTAINING DEBTORS' EIGHTY-SECOND  
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED AND/OR  
UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

Upon the eighty-second omnibus objection (the “Objection”)<sup>2</sup> of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and modifying and reducing the Overstated and/or Unliquidated Claims set forth in Schedule 1 and Schedule 2 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Overstated and/or Unliquidated Claim set forth in Schedule 1 and Schedule 2 attached hereto is modified and reduced. The claims listed in the column titled “Modified Claims” identified in Schedule 1 and Schedule 2 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover is preserved.

4. To the extent a response is filed regarding any Overstated and/or Unliquidated Claim, each such Overstated and/or Unliquidated Claim, and the Objection as it pertains to such Overstated and/or Unliquidated Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Overstated and/or Unliquidated Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

5. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

6. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

7. Nothing in the Objection or this Order, nor any actions or payments made by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication

or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

8. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

9. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: \_\_\_\_\_  
Wilmington, Delaware \_\_\_\_\_  
The Honorable John T. Dorsey  
Chief United States Bankruptcy Judge

**SCHEDULE 1**

**Overstated and/or Unliquidated Claims**

FTX Trading Ltd. 22-11068 (JTD)  
Eighty-Second Omnibus Claims Objection  
Schedule 1 - Modified Claims

Asserted Claims				Modified Claim		
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Debtor	Ticker Quantity
93660	Name on file	FTX Trading Ltd.	CUSDT USD USDT	103.00000000000000 103.00000000000000	West Realm Shires Services Inc.	4,682,70273528000000 0.000000000103020 0.0000000000000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.

93692 Name on file FTX Trading Ltd. GRT West Realm Shires Services Inc. 31.119104330000000  
MATIC 62.294273900000000  
USD 0.3480948000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtor seeks to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.

93489	Name on file	FTX Trading Ltd.	ALGO DOGE KSHIB MATIC SHIB SOL TRX USD YFI	West Realm Shires Services Inc.	349,066504038000000 2,000000000000000 1,268,78720742000000 137,140885450000000 13,888,800,08172440000000 9,866644541490572 175,546768260000000 0,05913902590844 0,004454950000000
				2,000,0000000000000000	

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.

33534	Name on file	FTX Trading Ltd.	BTC	Quoine Pte Ltd	0.0000638900000000
		SOL	117.40448375000000		0.0000000000000000
		USD	2.0700000000000000		0.0000000000000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.

57497 Name on file West Realm Shires Services Inc. BNB FTX Trading Ltd. 0.570445281285690  
USD 0.000000013528530  
USDT 0.00000004064446  
0.000000004064446

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials to their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtor seeks to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.

27747	Name on file	FTX Trading Ltd.	FTT	0.097138390000000	Quoine Pte Ltd	0.000000000000000
		USDC				0.124873700000000
		USDT		738.552512520000000		0.000000000000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials to their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtor seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.

82171	Name on file	FTX Trading Ltd.	ETH	3.0000000000000000	West Realm Shires Services Inc.	0.0000000000000000
			NFT (327930493906500944/NIGHT LIGHT #632)			1.0000000000000000
			USD	5,000.0000000000000000		1.0100000000000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.

33914	Name on file	FTX Trading Ltd.	ETH ETHW	West Realm Shires Services Inc.	0.0015649900000000 0.0015513100000000
			NFT (407866778783863248/ENTRANCE VOUCHER #1159) SHIB SOL USD	Undetermined*	1.0000000000000000 1.0000000000000000 0.2653412700000000 0.068666786202216

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.

94166	Name on file	FTX Trading Ltd.	AVAX		West Realm Shires Services Inc.	2.570088010000000
			BTC			0.0080793000000
			DOGE			1,655,10208860000000
			ETH			0.042410060000000
			ETHW			0.041883700000000
			LTC			0.507623680000000
			SHIB			9.000000000000000
			SOL			1.570400550000000
			USD	900.000000000000000		28.76989494492723
			USDT			0.00000000539504

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtor seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.

44058	Name on file	FTX Trading Ltd.	BTC	0.1903274900000000	Quoine Pte Ltd	0.0000000000000000
			ETH			0.0001300000000000
			SOL	22.49012928000000		0.0000000000000000
			SOL			0.0000000000000000
			SOL			0.0000000000000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.

against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.					
28031	Name on file	FTX Trading Ltd.	BTC	0.105061650000000	West Realm Shires Services Inc.
		DOGE	1.000000000000000		1.000000000000000
		ETH	1.750924460000000		1.750924460000000
		ETHW	1.505680440000000		1.505680440000000
		GRT			0.000000008527517
		NFT			
		(389207814616651036/MAGICEDEN			
		VAULTS)			1.000000000000000
		NFT			
		(392723067468383088/APEXDUCKS			
		#3012)			1.000000000000000

Undetermined\*: Indicates claim contains unliquidated and/or undetermined amounts

Claim Number	Name	Debtor	Asserted Claims		Modified Claim	
			Tickers	Ticker Quantity	Debtor	Ticker Quantity
			NFT (402043565580846538/EITBIT APE #2461)			1.0000000000000000
			NFT (420328881471212793/IMOLA TICKET STUB #1578)			1.0000000000000000
			NFT (424180528870312466/CRYPTO AVATAR ART #25)			1.0000000000000000
			NFT (534571177634271991/FANCY FRENCHIES #5879)			1.0000000000000000
			NFT (560472869188685612/MADTROOPER #3403)			1.0000000000000000
			SHIB	1.0000000000000000		1.0000000000000000
			SOL			0.000000003879843
			USD			0.002884879437438
			USDT			1.0013067100000000
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.						
93496	Name on file	FTX Trading Ltd.	BTC		West Realm Shires Services Inc.	0.0000496200000000
			USD			0.009050244331039
			USDT	546.0000000000000000		0.0000000000000000
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.						
93745	Name on file	FTX Trading Ltd.	SHIB		West Realm Shires Services Inc.	978,279,9222340000000000
			USD	100.0000000000000000		0.006532980000140
			USDT			0.000000005767112
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.						
29762	Name on file	FTX Trading Ltd.	BTC		West Realm Shires Services Inc.	0.0055098600000000
			DOGE			1.0000000000000000
			ETH			0.0732353900000000
			ETHW			2.0562913700000000
			LTC			
			NFT (369575162924398703/FTX - OFF THE GRID MIAMI #5424)			1.0000000000000000
			SHIB			9,891,200,834817010000000
			TRX			2,412,7716690400000000
			USD		Undetermined*	0.000080480709878
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.						
94255	Name on file	FTX Trading Ltd.	BTC		West Realm Shires Services Inc.	0.01768927102126
			DOGE			291,136647455720000
			ETH			0.0146416800000000
			SHIB			464,899,390348400000000
			SOL			1,296,761300000000
			USD	1,000.0000000000000000		354.0000004105445600
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.						
12093	Name on file	FTX Trading Ltd.	AAVE	0.0000000001000000	West Realm Shires Services Inc.	0.0000000001000000
			ETH	1.401442584976031		1.401442584976031
			ETHW	0.000000009463494		0.000000009463494
			LINK	0.000000002861595		0.000000002861595
			LTC	23.0863976500000000		23.0863976500000000
			MKR	1.3408840600000000		1.3408840600000000
			SOL	0.000000000787256		0.000000000787256
			USD	5,000.000000311233737		0.000000311233737
			USDT	0.000001536384366		0.000001536384366
			YFI	0.000000005816034		0.000000005816034
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.						
30966	Name on file	FTX Trading Ltd.	DOGE		West Realm Shires Services Inc.	79,698332421563400
			ETH			1.359530796350225
			ETHW			0.000000006350225
			GRT			0.000000007321898
			NFT (479694134685860689/AUSTRALIA TICKET STUB #198)			1.0000000000000000
			SOL			13.358093852460000
			USD		Undetermined*	0.000003326144590
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records. In addition, based on the Debtors' review of their books and records, the Debtor entity against which the Proof of Claim is asserted should be modified from the Debtor identified in the Asserted Claims to the Debtor identified in the Modified Claim.						

**SCHEDULE 2**

**Overstated and/or Unliquidated Claims**

**FTX Trading Ltd. 22-11068 (JTD)**  
**Eighty-Second Omnibus Claims Objection**  
**Schedule 2 - Modified Claims**

Claim Number	Name	Asserted Claims			Modified Claim	
		Debtor	Tickers	Ticker Quantity	Debtor	Ticker Quantity
53628	Name on file	FTX Trading Ltd.	USD	5,000,100.0000000000000000	FTX Trading Ltd.	5,000,100.0000000000000000
				Other Activity Asserted: Fiat USD899,649.02 - I have an account in FTX Blockfolio with customer ID##### and the holder is ##### with email address #####, same as this FTX.com account.		0.0000000000000000
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that no liability exists on account of the other activity asserted. The liability asserted in the claimant's other activity is reflected in filed claim 53607. Accordingly, the Debtors seek to modify the asserted claim to match their books and records.						
78357	Name on file	FTX Trading Ltd.	BTC	0.3548536900000000	FTX Trading Ltd.	0.3548536900000000
			BTC-PERP	-0.0000000000000007		-0.0000000000000007
			ETH	0.0005170500000000		0.0005170500000000
			ETHW	0.0795170500000000		0.0795170500000000
			FTT	0.0006106200000000		0.0006106200000000
			LINK-PERP	-0.000000000000454		-0.000000000000454
			SOL	51.2220529300000000		51.2220529300000000
			SRM	8,057.3288364100000000		8,057.3288364100000000
			SRM_LOCKED	411,651.1138364100000000		411,651.1138364100000000
			USD	2,760,106.5676791095000000		2,760,106.5676791095000000
				Other Activity Asserted: 1 NFT - I own one NFT ID 291222296035270200 on FTX.US		0.0000000000000000
Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that no liability exists on account of the other activity asserted. The liability asserted in the claimant's other activity is reflected in filed claim 78421. Accordingly, the Debtors seek to modify the asserted claim to match their books and records.						